

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,	No. 2:21-cr-4007-SRB
Plaintiff,	COUNT 1 18 U.S.C. § 922(g)(1) NMT 10 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release Class C Felony
v.	
CHAUNCEY ERIN HOWARD, [DOB: 08/23/1984]	
Defendant.	COUNT 2 18 U.S.C. § 924(c)(1)(A)(i) NLT 5 Years and NMT Life Imprisonment (Consecutive to Count 1) NMT \$250,000 Fine NMT 3 Years Supervised Release Class A Felony
	\$100 Special Assessment

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT 1
(Felon in Possession of a Firearm)
18 U.S.C. § 922(g)(1)

On or about July 22, 2020, within Boone County, in the Western District of Missouri, the defendant, **CHAUNCEY ERIN HOWARD**, knowing he had previously been convicted of a crime punishable for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms, that is, Taurus, model G3, 9mm, semi-automatic handgun, serial number ABD471224, S.C. Nova Grup S.R.L, model NAK-9, 9mm semi-automatic handgun, serial number RONVMB71918076, and Smith & Wesson, model SD40VE, .40 caliber semi-automatic handgun, serial number FCJ8530; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2
(Possession of a Firearm in Furtherance
Of a Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)(i)

Between dates, July 6, 2020, until July 22, 2020, said dates being approximate, within Boone County, in the Western District of Missouri, and elsewhere, the defendant, **CHAUNCEY ERIN HOWARD**, knowingly possessed firearms, those are, Taurus, model G3, 9mm, semi-automatic handgun, serial number ABD471224, S.C. Nova Grup S.R.L, model NAK-9, 9mm semi-automatic handgun, serial number RONVMB71918076, and Smith & Wesson, model SD40VE, .40 caliber semi-automatic handgun, serial number FCJ8530, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute marijuana; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL.

/S/ Eugene O'Loughlin
FOREPERSON OF THE GRAND JURY

/S/ Ashley S. Turner
ASHLEY S. TURNER
Assistant United States Attorney
Missouri Bar No. 62314

Dated: 02/25/2021